

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA  
*Criminal No. 21-173 (PJS/DTS)*

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

ANTON JOSEPH LAZZARO,

Defendant.

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**MOTION OF DEFENDANT FOR  
CONTINUANCE OF MOTION  
HEARING COURT DATE**

The defendant, Anton Joseph Lazzaro, by and through his attorney, Charles S. Clas Jr., respectfully moves the Court for an order rescheduling the upcoming motion hearing currently scheduled for February 17, 2022. A continuance until March 21, 2022 is requested. Mr. Lazzaro is seeking this continuance to ensure he is able to retain new trial counsel to sufficiently represent him in all matters related to the upcoming motion hearing.

Mr. Lazzaro discharged his attorneys Zachary Newland and Catherine Turner on February 3, 2022. Mr. Newland and Ms. Turner served as Mr. Lazzaro's lead counsel and were responsible for all criminal motion practice. Attorneys Charles Clas and Steven Kessler remain as attorneys of record for Mr. Lazzaro. Mr. Clas has not been responsible for any motion practice. Mr. Kessler has been solely responsible for addressing all forfeiture related motions. Mr. Lazzaro intends on hiring new lead counsel to represent him in all future motion hearings and serve as lead trial counsel moving forward.

Counsel for Mr. Lazzaro has conferred with Assistant United States Attorney Laura Provinzino who has been made aware of the circumstances of the requested continuance. Ms. Provinzino advised that the Government is opposed to this request.

Mr. Lazzaro was indicted in August 2021. Mr. Lazzaro was arrested in August 2021 and has remained in custody at the Sherburne County Jail since that time. Mr. Lazzaro is simultaneously filing a motion for exclusion of this time period from the Speedy Trial Act Calculation.

Respectfully submitted,

**WILSON & CLAS**

Dated: 2/8/2022

/s/ Charles S. Clas, Jr.  
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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was duly filed and served upon counsel of record, via the Court's CM/ECF system, this 8<sup>th</sup> day of February 2022.

Dated: 2/8/2022

/s/ Charles S. Clas, Jr.  
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